

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: PURDUE PHARMA L.P., et al.,

*Debtors.*¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**SCHEIN’S JOINDER IN JOINT OBJECTION OF DISTRIBUTORS,
MANUFACTURERS AND PHARMACIES TO MOTION OF DEBTORS FOR ENTRY
OF ORDER APPROVING (I) OMNIBUS CLAIMS OBJECTION PROCEDURES, (II)
OMNIBUS CLAIMS SETTLEMENT PROCEDURES AND
(III) OMNIBUS CLAIMS HEARING PROCEDURES**

Henry Schein, Inc.; Henry Schein Medical Systems, Inc.; Insource, Inc.; and General
Injectables & Vaccines, Inc. (collectively, the “Schein Entities”) file this Joinder in the *Joint
Objection of Distributors, Manufacturers and Pharmacies to Motion of Debtors for Entry of
Order Approving (I) Omnibus Claims Objection Procedures, (II) Omnibus Claims Settlement
Procedures and (III) Omnibus Claims Hearing Procedures* (Doc. 2644, the “*Joint Objection*”).²

The above-captioned debtors and debtors in possession (the “Debtors”) filed their *Motion of
Debtors for Entry of Order Approving (I) Omnibus Claims Objection Procedures, (II) Omnibus*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² By virtue of joining the Joint Objection, the Schein Entities do not consent to the jurisdiction of this Court or the entry of a final order or judgment by this Court on any matter other than this Objection and the Claims Procedures Motion, and reserve all rights to challenge the subject matter, core, non-core, or other jurisdiction, and/or constitutional authority, of this Court to enter final judgment on any matter other than the Joint Objection and the Claims Procedure Motion.

Claims Settlement Procedures and (III) Omnibus Claims Hearing Procedures (Doc. 2490, the “Claims Procedure Motion”) on March 16, 2021.

The Schein Entities filed claims in this matter based on or relating to claims brought against the Schein Entities and other defendants in the Opioid Litigation as defined in the *Joint Objection*. As set forth in the *Joint Objection*, Debtors, through the Claims Procedure Motion, seek to establish Proposed Procedures that deny the Schein Entities meaningful due process.

The Schein Entities intend to file or join in objections to the Proposed Plan and Disclosure Statement that will set forth in further detail their objections to their treatment under the Proposed Plan and show that the Proposed Plan is not confirmable.

For the reasons given in the *Joint Objection* (incorporated here by reference), which the Schein Entities join, the Schein Entities request that the Court enter an order: (a) denying the Claims Procedures Motion unless the Proposed Claims Procedures Order is modified to as requested in the *Joint Objection* and further modified to either: (i) provide that it does not apply to the Schein Entities’ claims, or (ii) resolve the Schein Entities’ objections raised herein and as raised through joinder in the *Joint Objection*, and (b) granting to the Schein Entities such other and further relief as is just and proper.

Dated: April 15, 2021

Respectfully submitted,

/s/ Brandon J. Montminy

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